



AIR DIFFUSION COUNCIL

104 SOUTH MICHIGAN AVENUE • SUITE 1500 • CHICAGO, IL 60603 • (312) 201-0101 FAX (312) 201-0214

May 22, 2001

For Hand Delivery to CEC Meeting -May 23, 2001
-June 14, 2001

William J. Keese, Chairman
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: Assembly Bill 970 - Changes to Title 24, Building Energy Efficiency Standards

Dear Mr. Keese:

On behalf of the Air Diffusion Council, a trade association of 20 flex manufacturers in North America, we take difference with the recent CEC actions for implementation on June 1, 2001.

Per the enclosed installation instruction sheet, ADC recommends the use of taped connections, secured with a mechanical clamp, as our **standardized method** of sealing joints and splices of flexible duct systems. We expressly specify pressure sensitive tapes marked as **UL 181B-FX** that have been tested and listed to the UL 181B Standard, Closure Systems for Use With Flexible Air Ducts and Air Connector.

We do not accept just any tape, only tapes complying to the UL 181B Standard and in compliance with the UL 181 listing of our product as required by NFPA 90A&B, IMC, BOCA, SBCCI, FDCA and the CEC (prior to this latest action). The ADC worked with UL and the tape manufacturers for 5 years to develop the test standard, resulting in an upgraded HVAC duct tape for the industry.

We request that the CEC reconsider this change and restore the acceptability of **all pressure sensitive tapes complying with UL 181B** for sealing flexible ducts.

Your cooperation in this matter is appreciated.

Sincerely,

Marvin A. Koerber
Engineering Committee Chairman

Enclosure

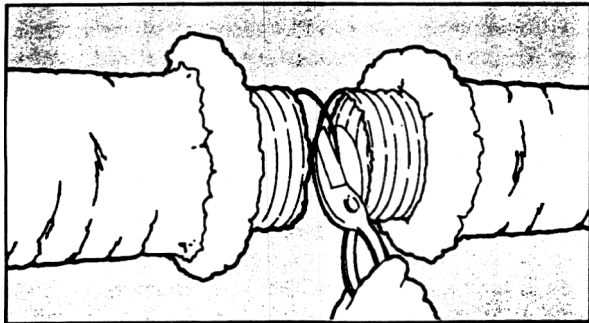
cc: J. Lagershausen (ADC)
ADC Engineering Committee

Installation Guidelines continued

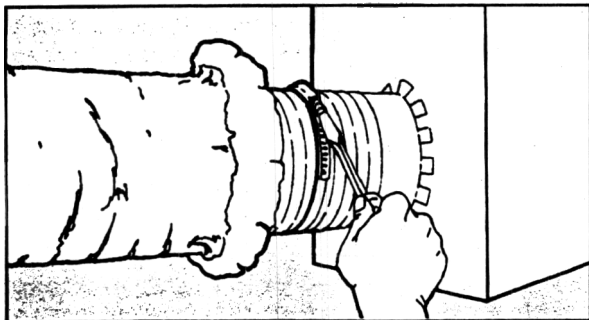
4.5 Installation Instructions for Air Ducts and Air Connectors - Nonmetallic with Plain Ends

Connections

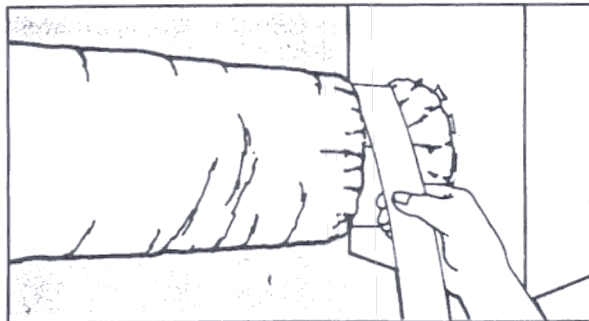
1. After desired length is determined, cut completely around and through duct with knife or scissors. Cut wire with wire cutters.



2. Pull back jacket and insulation from core. Slide at least 1" [25 mm] of core over collar, pipe or fitting. Tape core with at least 2 wraps of duct tape. Secure with clamp.

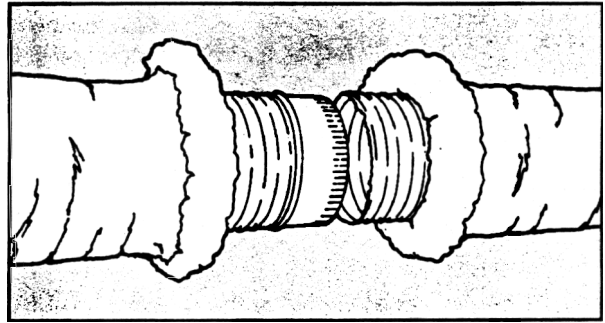


3. Pull jacket and insulation back over core. Tape jacket with at least 2 wraps of duct tape. A clamp may be used in place of or in combination with the duct tape.

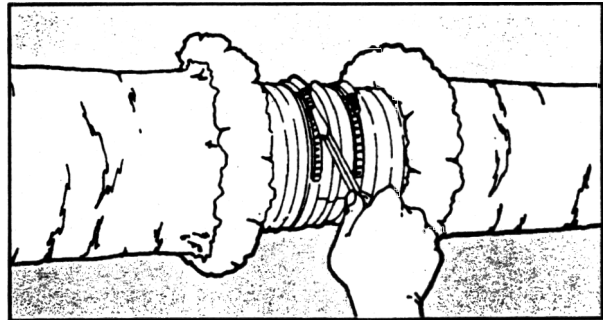


Splices

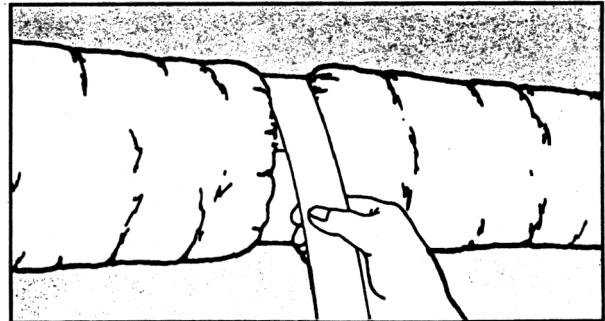
1. Peel back jacket and insulation from core. Butt two cores together on a standard 4" [100 mm] metal sleeve.



2. Tape cores together with at least 2 wraps of duct tape. Secure with 2 clamps.



3. Pull jacket and insulation back over cores. Tape jackets together with at least 2 wraps of duct tape.



NOTES:

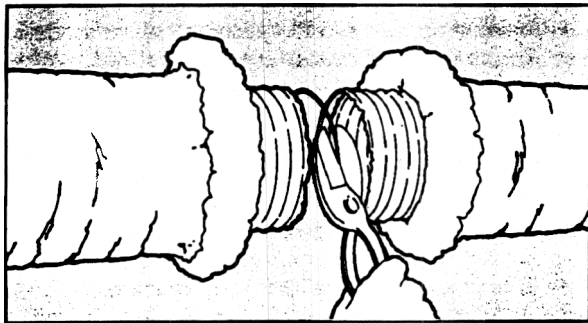
1. For uninsulated air ducts and air connectors, disregard references to insulation and jacket.
2. Use beaded fittings for pressures exceeding 2" w.g. [500 Pa] and for diameters 12" [300 mm] and larger.
3. Use tapes listed and labeled in accordance with Standard UL 181B and marked "181B-FX".
4. Use clamps as specified on manufacturer's UL 181 *Installation Instructions*.

Installation Guidelines continued

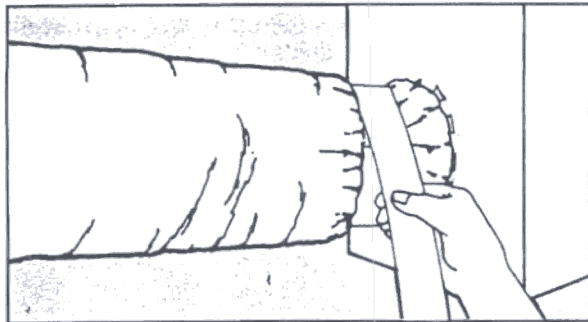
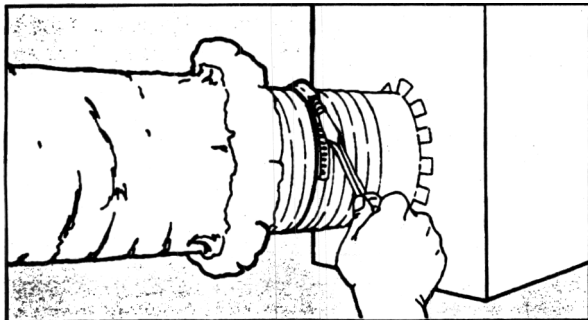
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Connections

1. After desired length is determined, cut completely around and through duct with knife or scissors. Cut wire with wire cutters.

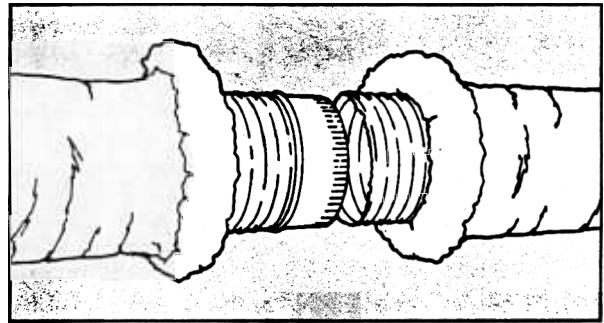


2. Pull back jacket and insulation from core. Slide at least 1" [25 mm] of core over collar, pipe or fitting. Tape core with at least 2 wraps of duct tape. Secure with clamp.



Splices

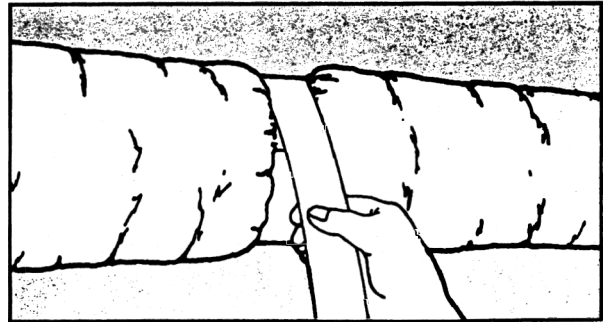
1. Peel back jacket and insulation from core. Butt two cores together on a standard 4" [100 mm] metal sleeve.



2. Tape cores together with at least 2 wraps of duct tape. Secure with 2 clamps.



3. Pull jacket and insulation back over cores. Tape jackets together with at least 2 wraps of duct tape.



NOTES:

1. For uninsulated air ducts and air connectors, disregard references to insulation and jacket.
2. Use beaded fittings for pressures exceeding 2" w.g. [500 Pa] and for diameters 12" [300 mm] and larger.
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